

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No:

Walter Milano, Personal Representative
and Administrator of the Estate of
Michael Milano
Plaintiff

vs

James J. Bulger,
Defendant
and
United States of America,
Reach and Apply Defendant

COMPLAINT

1. The Plaintiff Walter Milano, Personal Representative and Administrator of the Estate of Michael Milano, is a resident of the Commonwealth of Massachusetts.
2. The Defendant, James J. Bulger (hereinafter "Bulger"), is a resident of the Commonwealth of Massachusetts.
3. The reach and apply Defendant is the United States of America.
4. The Plaintiff has obtained a Judgment against the Defendant Bulger, in the amount of \$2,211,685.58 together with interest, and said Judgment has not been satisfied in any part. [Copy of Judgment and Execution are marked Exhibit A and B, respectively, and attached hereto.]
5. On or about June 24, 2011, the United States Government seized cash and other assets from the Defendant Bulger and upon information and belief continue to seek additional cash and assets.

Wherefore, the Plaintiff demands as follows:

- A. That the Defendant, United States of America, its agencies, corporations, officers or employees be enjoined from paying to Bulger or to any other person or entity any amount until the Plaintiff's Judgment is satisfied.

- B. That the cash and assets seized or obtained by the Defendant, United States of America, shall be reached and applied to the payment of Plaintiff's Judgment.
- C. That the Defendant, United States of America, its agencies, corporations, officers or employees be enjoined from transferring, assigning, distributing or otherwise disposing of their interest in any money/assets which are or may be in their possession until further order of the Court.
- D. That the Court issue a Temporary Restraining Order or Preliminary Injunction enjoining the Defendant, United States of America, its agencies, corporations, officers or employees from transferring, assigning, distributing or otherwise disposing of their interest in any money/assets which are or may be in their possession until further order of the Court.
- E. For such other further relief as the Court may deem fit.

The Plaintiff, Walter Milano as Personal Representative and Administrator of the Estate of Michael Milano

By his attorney,

/s/ James E. Riley, Jr.

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